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May 19, 2006

VIA HAND-DELIVERY

Mary Cottrell, Secretary
Department of Telecommunications & Energy
One South Station, 2nd Floor
Boston, MA 02110

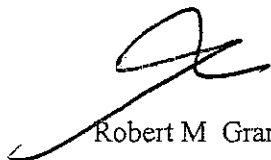
RE: Petition of Massachusetts Municipal Wholesale Electric Company to Intervene Out of Time - DTE 06-36

Dear Secretary Cottrell:

Enclosed for filing is the Petition of the Massachusetts Municipal Wholesale Electric Company to Intervene Out of Time.

Please contact me should you have any questions regarding this filing.

Sincerely,



Robert M. Granger

RMG/tk

Enc.

cc: John Cope-Flanagan, Assistant General Counsel

Julie Howely Westwater, Hearing Officer

George Yiankos

Andreas Thanos

Cynthia Bradbury

Rebecca Hanson

Patricia M. French, Esq.

Robert L. Dewees, Jr., Esq.

John K. Habib, Esq.

Petition of Bay State Gas Company for Approval
By the Department of Telecommunications & Energy
of a Proposal to Implement an Incremental
Capacity Planning Standard for Grandfathered Customers

The Massachusetts Municipal Wholesale Electric Company (“MMWEC”), pursuant to 220 C.M.R. §1.03, hereby requests that it be granted leave to intervene in the above-entitled proceeding. In support thereof, MMWEC asserts the following:

1. MMWEC is a public corporation and political subdivision of the Commonwealth, is constituted a public instrumentality as provided in its enabling legislation St. 1975, c. 775, and is in a superior position to represent its interest.

2. The name and address of the petitioner is:

Massachusetts Municipal Wholesale Electric Company
Moody Street, PO Box 426
Ludlow, MA 01056

3. All correspondence concerning this petition and other subsequent proceedings in this matter should be directed to:

Nicholas J. Scobbo, Jr., Esq.
Robert M. Granger, Esq.
Ferriter Scobbo & Rodophele, PC
125 High Street
Boston, MA 02110
(617) 737-1800

4. MMWEC is substantially and specifically affected by these proceedings as set forth below.

5. On March 31, 2006 Bay State Gas Company ("Bay State") filed a petition with the Department pursuant to 220 C.M.R. §1 04(5) requesting approval by the Department of a proposal to implement an incremental capacity planning standard for grandfathered customers and approval of related modifications to Bay State's Tariffs.

6. MMWEC transports natural gas over the Bay State system for use by MMWEC's Stony Brook Intermediate generating unit in Ludlow, MA. Bay State provides MMWEC firm transportation service for this purpose under a long-term gas transportation contract ("Contract") between Bay State and MMWEC.

7. As a long term firm transportation customer of Bay State, this proceeding may affect MMWEC's right and liabilities under its Contract with Bay State, or otherwise affect the transportation of gas by MMWEC over Bay State's facilities.

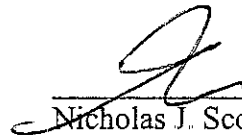
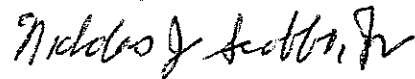
8. Good cause exists for MMWEC to be granted late intervention. The notice of filing and public hearing was issued by the Department on May 1, 2006. Petitions for leave to intervene were due only 10 days later, on May 11, 2006. MMWEC's petition was filed on May 18, 2006. MMWEC agrees to accept the current status of this proceeding and submits that its participation will not disrupt the proceedings nor prejudice nor burden the existing parties.

9. In the alternative, MMWEC requests that it be allowed to participate in this proceeding as a limited participant with rights to receive copies of all pleadings, discovery requests and responses, and to file briefs in accordance with the procedural schedule established by the Department.

WHEREFORE MMWEC respectfully requests that the Department grant it leave to
intervene.

**MASSACHUSETTS MUNICIPAL
WHOLESALE ELECTRIC COMPANY**

By its Attorneys



Nicholas J. Scobbo, Jr. (BBO #448900)

Robert M. Granger (BBO #

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Dated: May 19, 2006

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CERTIFICATE OF SERVICE

I Robert M. Granger hereby certify that I have this 19th day of May, 2006, served a true copy of the above by first class mail, postage prepaid, upon all parties of record.



Robert M. Granger